

EPA's E-Manifest System: Top Things You Need to Know

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Solid Waste Advisory Committee Meeting



Connecticut Department of Energy and Environmental Protection

Top Things to Know

- 1) Starts June 30, 2018
- 2) Changes only affect manifesting
- 3) No manifest copies to CT DEEP
- 4) Registration is strongly recommended



1) Starts June 30th

“e-Manifest System”:

- Federal law that starts June 30th in all 50 states
- Includes:
 - national on-line database called RCRAInfo;
 - central clearinghouse for EPA to collect manifests
 - EPA collects fees from waste receiving facilities for the cost of building and running the system



2) Changes Only Affect Manifesting

New Federal “e-Manifest Rules”:

- Guiding principle:
 - Just rules to make manifesting electronic
- No new hazardous wastes listings
- No other new hazardous waste rules



3) No copies required for DEEP

Current CT law:

- Generators send a copy to DEEP
- TSDFs send up to 2 copies to DEEP

e-Manifest law:

- Pre-empts state laws regarding copies, so...

No Copies Required for DEEP



No copies notice sent to HWAC listserv



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www.ct.gov/deep

Affirmative Action/Equal Opportunity Employer

Dear Generators and Receiving Facilities,

Please:



*sending copies of manifests
to DEEP as of June 30, 2018.*

Copies received will be recycled.

Thank you, DEEP



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No More Copies =

Snoopy Dance!



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NO MORE COPIES!



Details:

- Generators AND Receiving Facilities
- Do not send copies to DEEP
 - ✗ No pages or copies from the manifest form
 - ✗ No photocopies of any part of the manifest
 - ✗ Not for RCRA hazardous waste
 - ✗ Not for PCBs (TSCA and CT-Regulated Waste (CR01))
 - ✗ Not CT-Regulated Waste (“CROX codes”)
 - ✗ Bills of Lading
 - ✓ Exception: unresolved discrepancy reports



Kevin's Famous (Optional) Visual Demo



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4) Generators Should Register

Benefits of Registration:

- ✓ Access to correct errors
- ✓ View / track manifests 24/7/365 on any device
- ✓ Electronic Recordkeeping through RCRAInfo



4) Generators Should Register

Not registered means:

- ✗ Can't make corrections
- ✗ Cannot see the manifest until it is published 90+ days later
- ✗ No electronic recordkeeping allowed
- ✗ Must make special arrangements to get paper copy back from receiving facility
- ✗ Potential higher costs charged back to generator



More Info and Contacts:

- EPA Fact Sheets and Webpage:
 - [EPA E-Manifest Fact Sheets](#)
 - [EPA E-Manifest Webpage](#)
- DEEP Web links:
 - [DEEP Industry Apps Fact Sheet](#) and [DEEP Hazardous Waste Webpage](#)
 - Note: HWAC listserv will be notified when this is updated for E-Manifest
- DEEP Contacts:
 - E-Manifest
 - Kevin T. Sullivan, 860-424-3275, kevin.t.sullivan@ct.gov
 - Mark Latham, 860-418-5930, mark.latham@ct.gov
 - myRCRAid (site info changes, former EPA 8700-12 form)
 - Julie Dutton, 860-424-3279



Questions?



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